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November 27, 1998

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Federal Communications Commission
Office of the Secretary, Magalie Roman Salas
1919 M St., N. W., Room 222
Washington, D. C. 20554

WT Docket No. 98-143

Dear Ms. Salas:

I would like to take this opportunity to file my comments on your proposal. I have been a licensed Ham Operator for over 25 years. ***I am not in favor of reducing any of the morse code requirements for Amateur Licensing.***

You discuss in paragraph 21 the decreasing role of morse code in the (GMDSS.) I would like to remind you that the morse code is alive and well on the amateur bands. The code has always been a traditional part of our great hobby. Hams operate code or cw for ***sheer enjoyment*** not because they have anything against the new technology you mention.

You can still tune across the low end of 40 or 20 meters (when propagation is good) and find plenty of code activity today. Also, there have always been morse code traffic nets that meet *every night of the year* on 80 meters for the explicit purpose of handling 3rd party traffic throughout the nation and world. These operators often have a direct liaison to military affiliate or *Mars* stations. During times of disaster or emergency these operators come to light. And don't forget about the 30 meter band. This was *recently created as a 'cw and digital only'* band and is often a refreshing relief from the crowded conditions on some of the other hf bands. Cw is also used on frequencies above 50 MHz as was seen during the recent Leonid Meteor showers when hams on vhf were able to make contacts over much greater than normal distances due to meteor scatter. This type of operation often requires cw. ***So you can see that the morse code is still very much a part of our hobby.***

One of the reasons for the success of Amateur Radio is the ***sense of accomplishment*** one gets from studying for and obtaining the Ham Ticket. It is for this reason that I feel it important to retain the current 3 levels of code requirement which are 5, 13 and 20 wpm. The exam should remain well rounded, that is, having an emphasis on both code and theory.

You should therefore continue to offer the Tech Plus license. The 5 wpm is an introductory step into the world of hf radio and was designed for those who had an aversion to the code. With the limited privileges one gets their feet wet, so to speak, and often enough this leads to an incentive upgrade to general or higher. I can speak from

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personal experience as President of the Stateline Radio Club. I have seen a number of 'No Code Techs' upgrade to Extra Class and I can honestly say that the morse code was no barrier at all for these individuals. If someone wants to become a ham bad enough then they will do whatever it takes to get the license. This is one of the facts that adds to the self policing nature of our hobby. ***Hams tend respect and obey the rules because of the effort afforded in getting the license.*** The 11 meter Citizens Band should remain the radio service designed to *attract the masses*, not Amateur Radio.

Lowering the code requirement for the General Class License would accomplish nothing, in my opinion. We have already addressed the issue of a codeless license and those who are serious about operating usually discover that mastering the code is not so bad after all. This fact has always been seen as tradition of Ham Radio.

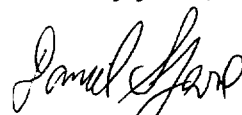
On the Extra Class License I feel that 20 wpm is not all that fast when you consider the fact that most hams send via electronic keyers or other software. If you've ever listened during a contest you know that 20 wpm can sometimes seem awfully slow. The purpose of the Extra Class is for those Hams who are really serious about operating and in particular operating on cw. The extra effort required pays off in the extra frequencies offered both on phone and cw. ***Lowering the code requirement for Extra will render the license class meaningless.***

As for the Novice License I feel you should do away with it as per your proposal but you might want to keep the 80 and/or 10 meter Novice bands intact along with the restrictions, since space is available. A Tech Plus could be able to operate on these Novice sub-bands. On 40 meters however, I feel you should give the space to phone and digital modes since it's really needed there. Also I would like to retain the names for each class of license.

I have commented on what I feel are the most important aspects of your license structure proposals. In summary I would like to see you maintain the current code requirements and privileges associated with these levels. I would also like to see you reduce the number of license classes by only 1, retaining the Tech Plus as an incentive. The Extra Class should remain as the 'top of the line' which requires the 20 wpm code exam. You should phase out any new Novice licensees but consider keeping some of the sub-bands where space allows.

Thank you for reading my comments.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Daniel S. Levine'.

Daniel S. Levine
WA2CLP